

March 12, 1980

Mr. Don C. Ellis
Williams Brothers Engineering Company
Resource Sciences Center
6600 South Yale Avenue
Tulsa, Oklahoma 74177

Dear Mr. Ellis:

This letter is in reply to your letter dated February 15, 1980, requesting an interpretation of ?195.208.

The enclosed pipeline safety regulatory interpretation gives the information you requested.

Sincerely,

/signed/

Cesar De Leon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

Enclosure

No. 80-6
Date: March 12, 1980

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

No
te: A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: ?195.208

SUBJECT: Welding of supports and braces.

FACTS: As given in letter February 15, 1980, from Mr. Don C. Ellis, Williams Brothers Engineering Company.

"In the design of a 16-inch oil pipeline in the Kuparuk Field, Alaska, for ARCO Oil and Gas Company, we have utilized sleeves welded to the line pipe for attachment of support saddles at anchor points."

"The procedure we are proposing involves placing half-shell sleeves around the line pipe circumference, attaching the sleeves via a fillet weld, and then affixing the anchor support to the sleeve thereby eliminating any support member being welded directly to the line pipe."

Question: Does the proposed method of attaching anchor supports to sleeves encircling the pipeline comply with the requirements of Section 195.208?

Interpretation: Section 195.208 states: "Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i.g." Because the proposed method of attaching supports does not include welding any support or brace to the pipe, the proposed method is in compliance with ?195.208.

Cesar De Leon
Associate Director for
Pipeline Safety Regulation

Materials Transportation Bureau

February 15, 1980

Mr. Caesar DeLong
Assistant Director
Materials Transportation Bureau
400 Seventh Street, S.W.
Washington, D. C. 20590

Reference: Explanation of DOT, Part 195, Paragraph 195.208

Dear Mr DeLong:

In the design of a 16-inch oil pipeline in the Kuparuk Field, Alaska, for ARCO Oil and Gas Company, we have utilized sleeves welded to the line pipe for attachment of support saddles at anchor points. It is our persuasion that this general design arrangement (see attached sketch) is in full accordance with the intent and provisions of Paragraph 195.208. However, in order to corroborate this interpretation, ARCO's Mr. Stratton has recently been in contact with your Mr. Fulton concerning this matter. Although we have received a concurring response from Mr. Fulton, we desire to document this inquiry and shall appreciate your reply.

The procedure we are proposing involves placing half-shell sleeves around the line pipe circumference, attaching the sleeves via a fillet weld, and then affixing the anchor support to the sleeve thereby eliminating any support member being welded directly to the line pipe. This procedure has been developed from our experience with carrying out code requirements on pipelines.

Our justification for interpretation has been substantiated from guidelines contained in B31.4, Section 421.1, Paragraph(d) and in Part 192, Section 192.162, Paragraph(d). While we realize 192 does not pertain to oil pipelines, we have referenced it as a clarification of intent.

Should you require additional information on this request, please advise us. We look forward to your reply.

Very truly yours,

WILLIAMS BROTHERS ENGINEERING COMPANY

Don C. Ellis
Project Manager

DB
C:\WP51\INTERPRT\195\208\80-03-12